




**Todd D. Kremin** | **Principal**  
**Email:** [tkremin@AgulnickKremin.com](mailto:tkremin@AgulnickKremin.com)  
**Direct:** +1 516-342-4494

**VIA ECF**

The Honorable Lewis Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

The consent requests for extensions are granted. The status conference currently set for June 6, 2025 is adjourned until July 25, 2025 at 10:30 a.m. in Courtroom 15C, 500 Pearl Street, New York, NY 10007. All Star's time to answer is extended to July 3, 2025. No proposed case management plan was attached to the letter, and so no change to the discovery schedule has yet been ordered.

June 4, 2025

SO ORDERED.  
  
LEWIS J. LIMAN  
United States District Judge

**Re: Penn-Star Ins. Co. v. All Star, 1 LLC et al**  
**Case No.: 1:24-cv-07311-LJL**

Dear Judge Liman,

This firm is counsel for the defendants, All Star 1, LLC, All Star Companies, Star Companies LLC and Star Rubbish Removal (collectively, "All Star") in the captioned matter. We filed a Notice of Appearance on June 2, 2025. We write, with consent of all parties, to provide a status update, and to request a 45-day adjournment of the status conference. The status conference is currently scheduled for June 6, 2025 and the parties request an adjournment of that conference until July 21, 2025 or other day convenient for the Court. In addition, All Star requests a thirty-day extension from today to July 3, 2025 to file their answer. All parties who have appeared consent to the extension and request for an adjournment of the conference and All Star's request for an extension of time to answer. This is the parties' first request to adjourn the status conference and All Star's first request for an extension of time to answer. In addition, as directed by the Court's May 9, 2025 order, the parties submit the attached proposed case management plan.

By way of background, this is a declaratory judgment action in which the plaintiff Penn-Star Insurance Company ("Penn-Star") seeks a declaration as to its denial of coverage and rescission of policy number PAV0432400 issued by the plaintiff to All Star and Star Rubbish Removal LLC for the policy period of April 4, 2023 to April 4, 2024 (the "Policy") with respect to several underlying lawsuit filed against All Star. The parties from the underlying suits have been named as defendants in this action as Penn-Star contends that those matters document that All Star was working outside of the type of work represented to Penn-Star as to the insured's business and also give rise to grounds for disclaimers under various provisions of the Policy. All Star denies those allegations.

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In view of the foregoing, and All Star's recent appearance in this lawsuit, the parties seek an adjournment of the conference so that All Star can interpose an answer to the complaint and counsel can further confer about the issues presented.

Respectfully submitted,  
Agulnick Kremin P.C.

A handwritten signature in blue ink, appearing to read "Todd D. Kremin", enclosed within a blue oval.

Todd D. Kremin

cc: All Counsel via ECF